

IN THE **CHANCERY/LAW** COURT FOR WASHINGTON COUNTY,
AT **JONESBOROUGH/JOHNSON CITY**, TENNESSEE

_____)	
)	
_____)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.: _____
vs.)	
)	
_____)	
)	
_____)	
)	
Defendant.)	

COMPLAINT FOR DIVORCE

Plaintiff, _____ sues
Defendant, _____, and alleges as follows:

I. STATISTICAL DATA

	<u>Husband</u>	<u>Wife</u>
NAME:	_____	_____
ADDRESS:	_____	_____
	_____	_____
EMPLOYER:	_____	_____
S.S.#	_____	_____
TANF #	_____	_____
BIRTH DATE:	_____	_____

<u>Husband</u>	<u>Wife</u>
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BIRTHPLACE: _____
(State) (State)

RACE: _____

NUMBER OF
PREVIOUS
MARRIAGES: _____

DATE & PLACE
OF THIS MARRIAGE: _____
(month, day, and year) (city and State)

DATE & PLACE
OF THIS SEPARATION: _____
(month, day, and year) (city and State)

MINOR CHILDREN OF MARRIAGE:

<u>Name</u>	<u>Date of Birth</u>	<u>Present Address</u>
_____	_____	With Mother/Father
_____	_____	With Mother/Father
_____	_____	With Mother/Father
_____	_____	With Mother/Father

II. GROUNDS

The Plaintiff is entitled to a divorce from the bonds of matrimony on the grounds that the Defendant has been guilty of such inappropriate marital conduct towards the Plaintiff as renders cohabitation unsafe and improper; or in the alternative, that the marriage of the parties is irretrievably broken due to irreconcilable differences, which exist between the parties.

III. FACTS

1 The **Wife/Husband** is a fit and proper person to be deemed the primary residential parent of the minor child/ren of the parties.

1 The Defendant is not now in the military service.

1 The Plaintiff has been a resident of the State of Tennessee for more than six (6)

months next preceding the filing of this action.

¶ The grounds for divorce arose in the State of Tennessee.

¶ The parties intend to enter into a Permanent Parenting Plan.

¶ The wife's former name was _____, and she wishes that name be restored to her.

¶ The parties own no real property jointly.

¶ The parties own certain automobile(s): a _____, titled in the name of _____ on which \$_____ is owed to _____.

¶ The parties own certain automobile(s): a _____, titled in the name of _____ on which \$_____ is owed to _____.

¶ The parties own certain automobile(s): a _____, titled in the name of _____ on which \$_____ is owed to _____.

¶ The parties own the usual household goods, furnishings, and personalty.

¶ There are no debts of the marriage.

¶ The parties owe the following debts of the marriage:

¶ The **Wife/Husband**, pursuant to T.C.A. §36-6-210, alleges that with respect to the minor child/ren of the parties, and custody proceedings in Tennessee or any other state, **she/he** has not participated, as a party, witness or in any other capacity, in any other litigation; has no information of any pending proceedings; and knows of no person not a party to this suit who has

physical custody or claims to have physical custody or visitation rights with respect to same. Within the last five years, the child/ren of the marriage **has/ve** lived with and at:

<u>Place</u>	<u>Period of Time</u>	<u>With Whom</u>
_____	_____	_____
Address	mo/day/yr. to mo/day/yr.	with/ parents/mother/father

City and State		
_____	_____	_____
Address	mo/day/yr. to mo/day/yr.	with/ parents/mother/father

City and State		
_____	_____	_____
Address	mo/day/yr. to mo/day/yr.	with/ parents/mother/father

City and State		
_____	_____	_____
Address	mo/day/yr. to mo/day/yr.	with/ parents/mother/father

City and State		
_____	_____	_____
Address	mo/day/yr. to mo/day/yr.	with/ parents/mother/father

City and State		

WHEREFORE THE PLAINTIFF PRAYS THAT:

¶ Process issue requiring Defendant to answer this Complaint but without verification.

¶ Process issue pursuant to T.C.A. §20-2-214, to be served by the Secretary of State of the State of Tennessee upon the Defendant whose present address is:

_____.

¶ The Plaintiff be granted an absolute divorce.

¶ The wife's former name _____, be restored to her.

¶ The **Wife/Husband** be deemed the primary residential parent of the parties' minor child/ren, the **Wife/Husband** be granted periodic residential parenting time pursuant to the attached Proposed Parenting Plan.

¶ The **Husband/Wife** be required to pay child support to the **Husband/Wife** for the care and maintenance of the minor child/ren of the marriage pursuant to the current child support guidelines. Unless evidence of income, such as tax returns for prior years, check stubs, or other information for determining child support is provided a request for support will be made based on an annual income of \$35,851.00 for the **Husband** and \$26,450.00 for the **Wife** as required by the child support guidelines.

¶ For purposes of calculating child support, if the **Husband/Wife** pays for healthcare insurance for the child/ren of this marriage, the **Husband/Wife** be required to notify and provide proof of payment to the **Husband/Wife**.

¶ The **Husband/Wife** is to notify the **Husband/Wife** if he/she has other child/ren in addition to the child/ren of the marriage; whether the children live in his/her home with him/her or live with someone else; and whether he/she is currently paying child support for any of these child/ren. If the **Husband/Wife** does not provide the **Husband/Wife** with this information within thirty (30) days of service of this Complaint, the **Husband/Wife** will calculate child support based on information provided by the **Husband/Wife**.

¶ The **Husband/Wife** is not aware of any prior tax debts that are owed to the Internal Revenue Service and not aware of any unreported income.

¶ Since the **Wife/Husband** is a recipient of TANF from the State of Tennessee for the care and support of the parties' minor child/ren, any payment, including any payment received through mandatory wage assignment, must be sent to Central Child Support Receipting Unit, P.O. Box 305200, Nashville, Tennessee 37229.

¶ The parties be awarded all household goods, furnishings, and personalty currently in their possession as their sole and separate property.

¶ The Plaintiff be awarded all household goods, furnishings, and personalty.

Including: _____

¶ The Defendant be required to pay the following debts of the marriage:
_____; and as between the parties, the Defendant be required to pay and the Plaintiff be held harmless therefrom.

¶ The Plaintiff be required to pay the following debts of the marriage:
_____; and as between the parties, the Plaintiff be required to pay and the Defendant be held harmless therefrom.

¶ The Plaintiff be granted full right, title and interest in a certain _____ automobile; the Defendant be required to execute all title documents necessary to effectuate the full title transfer to Plaintiff; the **Plaintiff/Defendant** be required to discharge any indebtedness on said automobile and as between the parties, hold the **Plaintiff/Defendant** harmless therefrom.

¶ The Plaintiff be granted full right, title and interest in a certain _____ automobile; the Defendant be required to execute all title documents necessary to effectuate the full title transfer to Plaintiff; the **Plaintiff/Defendant** be required to discharge any indebtedness on said automobile and as between the parties, hold the **Plaintiff/Defendant** harmless therefrom.

¶ The Defendant be granted full right, title and interest in a certain _____ automobile; the Plaintiff be required to execute all title documents necessary to effectuate the full title transfer to Defendant; the **Defendant/Plaintiff** be required to discharge any indebtedness on said automobile and as between the parties, hold the

Defendant/Plaintiff harmless therefrom.

¶ The Defendant be granted full right, title and interest in a certain _____ automobile; the Plaintiff be required to execute all title documents necessary to effectuate the full title transfer to Defendant; the **Defendant/Plaintiff** be required to discharge any indebtedness on said automobile and as between the parties, hold the **Defendant/Plaintiff** harmless therefrom.

¶ The Court approve the Agreed Parenting Plan submitted by the parties.

¶ The parties will evenly divide the costs of this cause.

¶ The Plaintiff be required to pay the costs of this cause.

¶ The Defendant be required to pay the costs of this cause.

¶ The Plaintiff have such other, further and general relief as the Court may deem equitable upon a final hearing of this cause.

PLAINTIFF, PRO SE

Address

City

State

Zip

Telephone Number

STATE OF TENNESSEE)
) SS.
COUNTY OF WASHINGTON)

I, _____, after being duly sworn according to law, make oath that I have read the foregoing Complaint for Divorce and that the facts set forth therein are true to the best of my knowledge, information and belief.

I further make oath that owing to my poverty, I am unable to bear the expense of this cause, but I am entitled to the relief sought to the best of my belief.

WITNESS MY HAND, this the _____ day of _____, 20____.

PLAINTIFF, PRO SE

Sworn to and subscribed before me, this
_____ day of _____, 20____.

NOTARY PUBLIC

My commission expires: _____

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